

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

H-D U.S.A., LLC,	)	
	)	Case No. 17-cv-04341
Plaintiff,	)	
	)	<b>Judge Thomas M. Durkin</b>
v.	)	
	)	<b>Magistrate Judge Young B. Kim</b>
ZHIYASM2016, et al.,	)	
	)	
Defendants.	)	
_____	)	

**Declaration of Justin R. Gaudio**

I, Justin R. Gaudio, of the City of Chicago, in the State of Illinois, declare as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff H-D U.S.A., LLC (“Harley-Davidson” or “Plaintiff”). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows:
2. Since and pursuant to entry of the TRO, dozens of PayPal accounts associated with the Defendant Internet Stores have been frozen.
3. **Exhibit 1** attached hereto is a true and correct copy of unpublished decisions cited in Harley-Davidson’s Memorandum.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this the 26<sup>th</sup> day of June 2017 at Chicago, Illinois.

\_\_\_\_\_  
/s/ Justin R. Gaudio  
Justin R. Gaudio  
Counsel for Plaintiff H-D U.S.A., LLC